

AO 91 (Rev. 08/09) Criminal Complaint

United States District Court
Southern District of Texas
FILED

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

MAR 25 2019

David J. Bradley, Clerk

United States of America
Magnoly JUAREZ-Olmos
Mexican National
YOB 1993

Case No.

M-19-0669-M

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 23, 2019 in the county of Hidalgo in the
Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

21 United States Code § 952

Defendant did knowingly and intentionally import from the United Mexican States into the United States approximately 43.40 kilograms of methamphetamine a scheduled II controlled substance

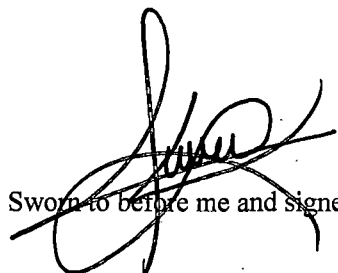
21 United States Code § 952

Defendant did knowingly and intentionally import from the United Mexican States into the United States approximately 19.98 kilograms of heroin a scheduled I controlled substance

This criminal complaint is based on these facts:

SEE ATTACHMENT "A"

✓ Continued on the attached sheet.



Sworn to before me and signed in my presence.

Date: 3/25/20198:22 amCity and state: McAllen, Texas

Complainant's signature

Laurence Diamond, HSI-SA

Printed name and title



Judge's signature

Peter Ormsby, US Magistrate Judge

Printed name and title

Attachment "A"

On March 23, 2019, Homeland Security Investigations (HSI), McAllen, Texas, was notified by United States Customs and Border Protection (CBP) that Magnoly JUAREZ-Olmos made entry into the United States via the Pharr Port of Entry in Pharr, Texas. JUAREZ-Olmos was the driver of a white Nissan Rogue displaying Tamaulipas, Mexico license plates WZJ187A. JUAREZ-Olmos was selected for an Automated Targeting System (ATS) secondary inspection.

During secondary inspection JUAREZ-Olmos gave a negative declaration to CBP Officers (CBPOs) for possessing any contraband to include narcotics. CBPOs utilized a narcotic detection canine to inspect the vehicle and received a positive alert to all four tires for the possible presence of narcotics. CBPOs then utilized the Z-Portal x-ray machine to conduct a scan of the vehicle and were able to observe anomalies in all four tires.

CBPOs discovered 18 packages of methamphetamine totaling 43.40 kilograms and 6 packages of heroin totaling 19.98 kilograms concealed within the vehicle's tires. The narcotics were sealed in aftermarket metal compartments welded to the wheel. A field test of the methamphetamine and heroin was conducted. CBP Officers received a positive reaction for both methamphetamine and heroin individually.

HSI McAllen Special Agents in conjunction with CBP Enforcement Officers responded to the Pharr, Texas Port of Entry to interview JUAREZ-Olmos. JUAREZ-Olmos was read the Miranda Warnings which she waived and voluntarily agreed to speak with Agents. JUAREZ-Olmos was interviewed post-Miranda and admitted culpability stating she knew she was smuggling narcotics into the United States.